



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

April 17, 2007

Ms. Shirley J. Olinger, Acting Manager  
Office of River Protection  
United States Department of Energy  
P.O. Box 450, MSIN: H6-60  
Richland, Washington 99352

Mr. William S. Elkins, Project Director  
Bechtel National, Inc.  
2435 Stevens Center, MSIN: H4-02  
Richland, Washington 99354

Re: Submittal of Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit Modification Notification Form 24590-HLW-PCN-ENV-06-016; Class 1 Modification to the Hanford Facility RCRA Permit, Dangerous Waste Portion for the Treatment, Storage, and Disposal of Dangerous Waste, Part III, Operating Unit 10 (Waste Treatment and Immobilization Plant), WA7890008967

Dear Ms. Olinger and Mr. Elkins:

The Department of Ecology approves the changes to the High Level Waste Vitrification System Melter Cave Support Handling System Design Proposal Drawing Decontamination Tank, 24590-HLW-M0-HSH-P0072, in the referenced Class 1 Modification. Enclosed is the approved Hanford Facility RCRA Permit Modification Notification Form.

We have concerns with the regulatory status and compliance of the parts washer drain line and how it interfaces with the decontamination tank system. We are addressing these issues in our review of permit modification 24590-HLW-PCN-ENV-06-025.

It is our understanding that any design changes to the decontamination tank (HSH-TK-00001/00002) resulting from issue resolution will be done by design change documentation and submitted to Ecology in accordance with permit condition III.10.C.9.h. Therefore, we are choosing to approve the requested modifications in 24590-HLW-PCN-ENV-06-016.

If there are any questions, contact me at 509-372-7882 or Ed Fredenburg at 509-372-7899.

Sincerely,

Brenda Becker-Khaleel  
WTP Permit Lead  
Nuclear Waste Program

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**EDMC**

trw:jc  
Enclosure

cc: See next page

Ms. Olinger and Mr. Elkins  
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cc/electronic w/enc:

John Eschenberg, USDOE  
Lori Huffman, USDOE  
Tony McKarns, USDOE  
Gae Neath, USDOE  
Don Sommer, USDOE  
William Taylor, USDOE  
Julie Atwood, BNI  
Brad Erlandson, BNI  
Peggy Fisher, BNI  
Stan Hill, BNI  
Dennis Klein, BNI  
Sandi Murdock, BNI  
Phil Peistrup, WGI

cc w/enc:

Administrative Record: Tank Waste Treatment Requirements H-0-8  
Environmental Portal  
USDOE-ORP Correspondence Control

Quarter Ending 03/31/2007

24590-HLW-PCN-ENV-06-016

<b>Hanford Facility RCRA Permit Modification Notification Form</b>																								
Unit: <b>Waste Treatment and Immobilization Plant</b>		Permit Part & Chapter: <b>Part III, Chapter 10 and Attachment 51</b>																						
<p><u>Description of Modification:</u></p> <p>This modification addresses changes to HLW Vitrification System HSH Design Proposal Drawing Decontamination Tank (24590-HLW-M0-HSH-P0072), located in Appendix 10.6 of the Dangerous Waste Permit. The revised drawing includes additional design details and updated dimensions, based on the vendor submittals. Because this revision is a complete redraw, as stated in the drawing's revision history block, the revision clouds are not shown.</p> <p>The revised drawing includes the following changes:</p> <ul style="list-style-type: none"> <li>Revised Note 1 to clarify bounding sizes</li> <li>Revised Note 2 addressing the tank lifting features</li> <li>Revised Note 3 requirements for name plates</li> <li>Revised Note 9 to reference specification 24590-WTP-3PS-HD00-TP001</li> <li>Revised Note 11 adding information on providing jumper nozzle</li> <li>Deleted Notes 5, 6, and 8 and added Notes 12, 13, and 14</li> <li>Updated tank dimensions</li> <li>Relabeled Section D-D to View D-D</li> <li>Revised Section E-E and Detail 1</li> <li>Modified Parts List by adding items 19 through 25</li> <li>Revised the Reference Drawings table</li> <li>Added Jumper Nozzle Identification Table</li> <li>Added Plant Item Number list</li> <li>Added detail for the field welding of the Tank Drain Piping</li> </ul> <p>Please replace the following drawing in Appendix 10.6 of the Dangerous Waste Permit.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="5" style="padding: 2px;">Appendix 10.6</td> </tr> <tr> <td style="width: 15%; padding: 2px;">Replace:</td> <td style="width: 35%; padding: 2px;">24590-HLW-M0-HSH-P0072, rev. 0</td> <td style="width: 15%; padding: 2px;">With:</td> <td colspan="2" style="width: 35%; padding: 2px;">24590-HLW-M0-HSH-P0072, rev. 1</td> </tr> <tr> <td style="padding: 2px;">WAC 173-303-830 Modification Class:<sup>12</sup></td> <td style="padding: 2px;">Class 1</td> <td style="padding: 2px;">Class 1<sup>1</sup></td> <td style="padding: 2px;">Class 2</td> <td style="padding: 2px;">Class 3</td> </tr> <tr> <td style="padding: 2px;">Please mark the Modification Class:</td> <td style="text-align: center; padding: 2px;">X</td> <td></td> <td></td> <td></td> </tr> </table> <p>Enter Relevant WAC 173-303-830, Appendix I Modification citation number: A.1 and A.3.</p> <p>Enter wording of WAC 173-303-830, Appendix I Modification citation:</p> <p>A.1. Administrative and informational changes</p> <p>A.3. Equipment replacement or upgrading with functionally equivalent components (e.g., pipes, valves, pumps, conveyors, controls).</p>					Appendix 10.6					Replace:	24590-HLW-M0-HSH-P0072, rev. 0	With:	24590-HLW-M0-HSH-P0072, rev. 1		WAC 173-303-830 Modification Class: <sup>12</sup>	Class 1	Class 1 <sup>1</sup>	Class 2	Class 3	Please mark the Modification Class:	X			
Appendix 10.6																								
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WAC 173-303-830 Modification Class: <sup>12</sup>	Class 1	Class 1 <sup>1</sup>	Class 2	Class 3																				
Please mark the Modification Class:	X																							
Modification Approved: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (state reason for denial) Reason for denial:		Reviewed by Ecology: <div style="text-align: right; margin-top: 10px;">               S. Dahl           </div> <div style="text-align: right; margin-top: 10px;">             4/17/07              Date           </div>																						

<sup>1</sup> Class 1 modifications requiring prior Agency approval.<sup>2</sup> This is only an advanced notification of an intended Class 1, 2, or 3 modification, this should be followed with a formal modification request, and consequently implement the required Public Involvement processes when required.